

ORIGINAL  
FILE



**Cincinnati Bell  
Telephone**

**Barbara J. Stonebraker**  
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Phone: (513) 397-1280

September 11, 1992

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Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W. Room 222  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of: Amendment of )  
Parts 65 and 69 of the )  
Commission's Rules to Reform )  
the Interstate Rate of Return )  
Represcription and Enforcement )  
Processes )

CC Docket No. 92-133

Dear Ms. Searcy:

Enclosed herewith for filing are the original and nine copies of Cincinnati Bell Telephone Company's comments in the above referenced matter.

Also, provided herewith is a duplicate copy of this letter and the enclosures. Please date stamp and return this as acknowledgment of its receipt.

Sincerely,

Enclosures

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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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In the Matter of Amendment of :  
Parts 65 and 69 of the :  
Commission's Rules to Reform : CC Docket No. 92-133  
the Interstate Rate of Return :  
Represcription and Enforcement :  
Processes :

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COMMENTS OF  
CINCINNATI BELL TELEPHONE COMPANY

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William D. Baskett III  
Christopher J. Wilson

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Attorneys for Cincinnati Bell  
Telephone Company

Dated: September 11, 1992

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COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY

Cincinnati Bell Telephone Company (CBT) hereby submits these comments on the Commission's Notice of Proposed Rulemaking and Order (NPRM) released on July 14, 1992, in the above-captioned proceeding.<sup>1/</sup>

CBT, as a member of the United States Telephone Association (USTA), actively participated in the preparation of the comments being filed today by the USTA (the "USTA Comments"), and fully supports the USTA Comments. CBT, a non-price cap local exchange carrier, will be directly impacted by any Commission action in this docket. CBT submits that if the Commission truly desires to simplify the rate of return

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<sup>1/</sup> In the Matter of Amendment of Parts 65 and 69 of the Commission's Rules to Reform the Interstate Rate of Return Represcription and Enforcement Processes, Notice of Proposed Rulemaking and Order, CC Docket No. 92-133, released July 14, 1992.

represcription and enforcement processes so they do not impose unnecessary burdens on the telecommunications industry,<sup>2/</sup> the suggestions set forth in the USTA Comments must be incorporated in the Commission's final rule.

Respectfully submitted,

FROST & JACOBS

By Thomas E. Taylor (CJW)

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Cincinnati, OH 45202  
(513) 651-6800

Dated: September 11, 1992

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<sup>2/</sup> NPRM, at paragraph 8.

CERTIFICATE OF SERVICE

I, Lawrence H. Lovelace, do hereby certify on this 11th day of September, 1992, that I have caused a copy of the foregoing Comments of Cincinnati Bell Telephone Company to be mailed, via first class United States Mail, postage prepaid, to the persons on the attached Service List.



Lawrence H. Lovelace

\*Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
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Washington, D.C. 20554

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